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August 7, 2025

Hon. Peggy Kuo  
U.S. Magistrate Judge  
U.S. District Court, Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: *Wang v. Chung Fat Supermarket Inc. et al.*, Case No. 1:25-cv-02236—MKB-PK

Dear Judge Kuo:

We represent Defendants Chung Fat Supermarket Inc., Yue Mei Jiang, Xue Fen Jiang, Xinyu Jiang, and Xin Xin Chiang (“Company Defendants”) in this action. We write pursuant to Your Honor’s Individual Rules IV to request that the initial conference currently scheduled for August 29, 2025, be adjourned *sine die* until the resolution of Defendants’ motions to dismiss. 06/27/2025 Dkt. Entry. Relatedly, Company Defendants request adjournment of the associated deadlines for the parties to meet and confer pursuant to Fed. R. Civ. P. 26 ten business days prior to the conference and to file a proposed discovery plan by August 22, 2025 until resolution of all Defendants’ motions to dismiss. *Id.*; Dkt. No. 7.

On August 4, 2025, the Company Defendants filed a letter to Chief Judge Brodie seeking a pre-motion conference over their anticipated motion to dismiss the entire Complaint. Dkt. No. 25. Defendant Zhi Liang Chen joined in this request and stated that he anticipated filing a motion to dismiss as well. Dkt. No. 28. If the motions to dismiss are granted, it would obviate the need for discovery or further litigation in this matter as to all Defendants. Plaintiff and Defendant Zhi Liang Chen consent to this request.

This is Company Defendants’ second request to adjourn the initial conference. The initial conference was originally scheduled for July 2, 2025, and the Court granted Company Defendants’ first adjournment request because Plaintiff had not yet filed a Complaint. *See* Dkt. No. 13.

We thank the Court for its time and consideration of this request.

Sincerely,  
/s/ Kevin K. Yam

Kevin K. Yam